

# **Exhibit 4**

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November 12, 2020

**BY EMAIL**

Matthias Kamber  
Keker, Van Nest, & Peters LLP  
633 Battery Street  
San Francisco, CA 94111-1809

RE: *Singular Computing LLC v. Google LLC*, 1:19-cv-12551-FDS (D. Mass.)

Dear Matthias:

I write in response to your email of November 11<sup>th</sup>, in which you renege on your previous promise to provide samples of the Accused Products, and falsely claim that the source code files “were made available” to Prince Lobel.

**First**, we require samples of the accused products, which Google must provide under the Local Rules, and which you agreed to provide last week. You reiterated this promise earlier this week before the Court at the joint status conference held Monday, Nov. 9<sup>th</sup>. If you do not provide samples of the accused products by **Friday, November 13<sup>th</sup>**, we will immediately move to compel their production.

**Second**, we require the source code files that define the accused products, which Google must provide under the Local Rules and which you agreed to provide last week. You claim that the source code files “were made available as of November 6<sup>th</sup>” but this is not correct—on November 6<sup>th</sup>, the deadline for production of source code, you merely told us that the source code “will be available,” and withheld essential details about the code production, including:

1. the address or addresses at which the source code will be available (we will try to accommodate your preferred location, though in view of the global pandemic, we might need to arrange for production of source code in alternative locations);
2. dates and times when the source code will be available;
3. information about the contents of the source code, including but not limited to: the programming language(s) used in the code, and the number of files/lines of code that will be produced.

Only after this information has been provided can we identify an appropriate expert or experts who will be able to review the source code. If you do not provide all of the above information by **Friday, November 13<sup>th</sup>**, we will immediately move to compel the production of source code.

Sincerely,



Brian M. Seeve